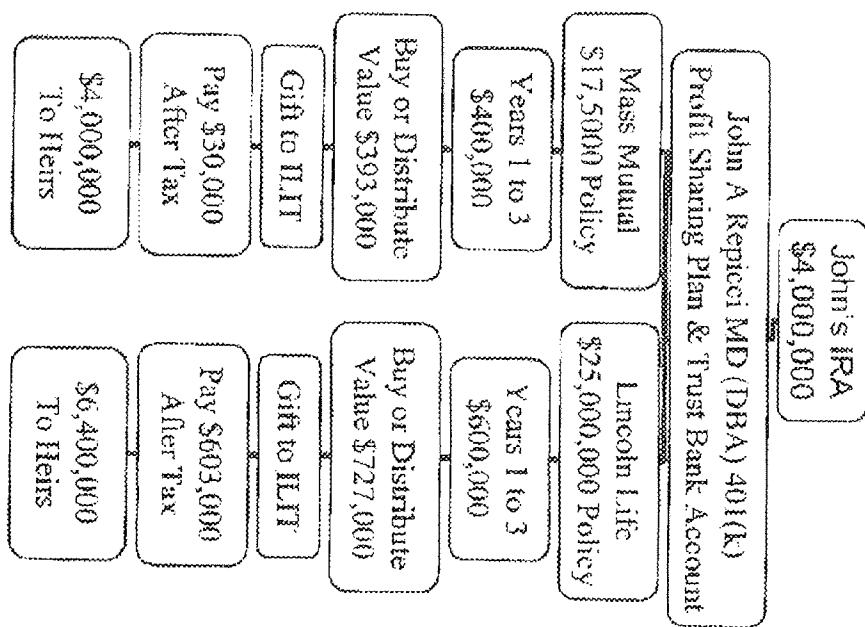


# **EXHIBIT B**

# Outline of Plan for IRA Assets



## Steps for the CTS

- \* Transfer \$4,000,000 from IRA to John A. Repicci MD (DBA) 401(k) Profit Sharing Plan & Trust FBO John Repicci Account (Only \$1,000,001 needs to be transferred immediately. The remainder can come over time.)
- \* Write check for \$400,000 to Mass Mutual from IRA Account.
- \* Write check for \$600,000 to Lincoln Life from IRA Account.
- \* Receive policies for a total of \$42,500,000 from both insurers.
- \* Repeat steps 2 and 3 in 12 months and 24 months
- \* In 31 months, you will either purchase (for \$1,120,000) the insurance policies from your plan or distribute them to yourself (creating \$1,120,000 of taxable income to you).
- \* You will gift the policies to your ILIT, removing them from your estate (Assuming you or Lorraine live 3 years).
- \* Assuming both of you are in good health, you will reduce the face amounts to a total of \$14,000,000.
- \* When you are Lorraine pass away, your heirs will receive \$14,000,000 tax-free (compared to nearly \$4,000,000 if you do not do this plan).